

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BIANCA FRASER-JOHNSON and
MICHAEL JOHNSON,

Plaintiffs,

v.

C. R. BARD, INC., BARD PERIPHERAL
VASCULAR, INC., CHRISTIANA CARE
HEALTH SERVICES, INC., CHRISTIANA
CARE HEALTH SYSTEM, INC., THOMAS
BAUER, M.D., CYNTHIA HELDT, M.D.,

Defendants.

Case No: 1:15-cv-00968-LPS

**DEFENDANTS' C. R. BARD, INC. AND BARD PERIPHERAL VASCULAR, INC.'S
MOTION TO SEVER AND REMAND CLAIMS AGAINST DEFENDANTS
CHRISTIANA CARE HEALTH SERVICES, INC., CHRISTIANA CARE HEALTH
SYSTEM, INC., THOMAS BAUER, M.D., AND CYNTHIA HELDT, M.D.**

Pursuant to Federal Rule of Civil Procedure 21, Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively "Bard" or "Bard Defendants"), by and through their undersigned counsel, hereby move the Court for an order severing and remanding the claims against Defendants Christiana Care Health Services, Inc., Christiana Care Health System, Inc., Thomas Bauer, M.D., and Cynthia Heldt, M.D. (collectively the "Health Care Defendants") to the Superior Court of Delaware, New Castle County. The grounds for Motion are set forth in greater detail in the Opening Brief in Support of C. R. Bard, Inc. and Peripheral Vascular's Motion to Sever and Remand Claims Against Defendants Christiana Care Health Services, Inc., Christiana Care Health System, Inc., Thomas Bauer, M.D., and Cynthia Heldt, M.D. filed concurrently herewith.

Dated: October 29, 2015

Respectfully submitted,

REED SMITH LLP

/s/ Diana Rabeh

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C.R. Bard Peripheral Vascular, Inc.*